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Susan Halevy  
9  
10

11 **UNITED STATES BANKRUPTCY COURT**  
12 **CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

13 In re:

14 SEATON INVESTMENTS, LLC, *et al.*,

15 Debtors and Debtors in  
16 Possession.  
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Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:  
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;  
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;  
2:24-bk-12074-VZ; 2:24-bk-12075-VZ  
and 2:24-bk-12076-VZ

Chapter 11

**STIPULATION TO CONTINUE  
HEARING ON MOTION TO  
AUTHORIZE USE OF CASH  
COLLATERAL PURSUANT TO 11  
U.S.C. § 363(C)(2)**

Date: July 23, 2024  
Time: 11:00 a.m.  
Crtrm.: 1368

- ☐ Affects All Debtors.
- ☐ Affects Seaton Investments, LLC
- ☐ Affects Colyton Investments, LLC
- ☐ Affects Broadway Avenue Investments, LLC
- ☒ Affects SLA Investments, LLC
- ☒ Affects Negev Investments, LLC
- ☒ Affects Alan Gomperts
- ☐ Affects Daniel Halevy
- ☒ Affects Susan Halevy

SLA Investments, LLC ("SLA"), Negev Investments, LLC ("Negev"), Susan Halevy ("Susan" or "Susan Halevy"), and Alan Gomperts ("Alan" or "Alan Gomperts"), debtors and debtors-in-possession (the "Debtors"), Archway Real Estate Income Fund I REIT, LLC, fka Archway Real Estate Income Fund I SPE I, LLC ("Archway"), Wells Fargo Bank National West ("Wells Fargo"), and Harvest Small Business Finance, LLC ("Harvest") (Archway, Wells Fargo and Harvest, collectively, the "Lenders")— in the above-entitled jointly administered chapter 11 bankruptcy cases (the "Bankruptcy Cases") hereby stipulate as follows:

**RECITALS**

1. On March 18 and 19, 2024 the Debtors filed their jointly administered voluntary chapter 11 cases.
2. On June 7, 2024 the Debtors filed their *Motion By Affected Debtors For Entry Of An Order Authorizing Use Of Cash Collateral Pursuant To 11 U.S.C. § 363(c)(2)* ("Motion") (doc. no. 87).
3. The initial hearing on the Motion was held on June 20, 2024 on shortened time.

1 4. A continued hearing was scheduled for July 23, 2024, at 11:00 a.m.

2 5. On July 18, 2024, the Court entered its order authorizing the Debtors' interim use of  
3 cash collateral through July 23, 2024 (doc. no. 127) (the "Interim Cash Collateral Order").

4 6. The Lenders and the Debtors are engaged in negotiations regarding the terms of long-  
5 term authorization for the Debtors' use of cash collateral and require more time to negotiate those  
6 terms.

7 7. Accordingly the Lenders and the Debtors enter into this stipulation.

8  
9 **STIPULATION**

10 8. The foregoing recitals are incorporated herein.

11 9. The Lenders and the Debtors stipulate and agree that the status conference on the  
12 Motion should be further continued from July 23, 2023 to August 27, 2024, at 11:00, or to another  
13 date convenient to the Court that is approximately one month after July 23, 2024.

14 10. The Lenders and the Debtors stipulate and agree that the Debtors' authorization to  
15 use cash collateral should be extended through the same date as the further continued status  
16 conference on interim cash collateral use.

17 11. The Lenders and the Debtors stipulate and agree that all the terms of the Interim  
18 Cash Collateral Order, including specifically the grants of adequate protection including the  
19 Replacement Liens and limitations on use of cash collateral, shall remain in full force and effect  
20 and unchanged during the continued interim period between July 23, 2024, and the continued status  
21 conference on interim cash collateral use.

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23 [Continued on Next Page]  
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12. This stipulation is without prejudice to the parties entering into other or further stipulations subject to Court approval.

**SO STIPULATED.**

Dated: July 19, 2024

**SAUL EWING LLP**

By: /s/ Zev Shechtman  
Zev Shechtman, Attorneys for Individual Debtors

Dated: July 21, 2024

**WEINTRAUB ZOLKIN TALERICO & SELTH LLP**

By:   
Derrick Talerico, Attorneys for Corporate Debtors

Dated: July \_\_, 2024

**FRANDZEL ROBINS BLOOM & CSATO, L.C.**

By: \_\_\_\_\_  
Gerrick M. Warrington, attorneys for ARCHWAY  
REAL ESTATE INCOME FUND I REIT, LLC, fka  
Archway Real Estate Income Fund I SPE I, LLC

Dated: July \_\_, 2024

**HEMAR, ROUSSO & HEALD, LLP**

By: \_\_\_\_\_  
Jacqueline L. James , attorneys for HARVEST  
SMALL BUSINESS FINANCE, LLC

Dated: July \_\_, 2024

**ALDRIDGE PITE, LLP**

By: \_\_\_\_\_  
Todd S. Garan, attorneys for WELLS FARGO  
BANK NATIONAL WEST

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**SO STIPULATED.**

Dated: July 19, 2024

**SAUL EWING LLP**

By: \_\_\_\_\_  
Zev Shechtman, Attorneys for Individual Debtors


Dated: July \_\_, 2024

**WEINTRAUB ZOLKIN TALERICO & SELTH LLP**

By: \_\_\_\_\_  
Derrick Talerico, Attorneys for Corporate Debtors

Dated: July 22, 2024

**FRANDZEL ROBINS BLOOM & CSATO, L.C.**

By:   
Gerrick M. Warrington, attorneys for ARCHWAY  
REAL ESTATE INCOME FUND I REIT, LLC, fka  
Archway Real Estate Income Fund I SPE I, LLC

Dated: July \_\_, 2024

**HEMAR, ROUSSO & HEALD, LLP**

By: \_\_\_\_\_  
Jacqueline L. James , attorneys for HARVEST  
SMALL BUSINESS FINANCE, LLC

Dated: July \_\_, 2024

**ALDRIDGE PITE, LLP**

By: \_\_\_\_\_  
Todd S. Garan, attorneys for WELLS FARGO  
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Derrick Talerico, Attorneys for Corporate Debtors


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Archway Real Estate Income Fund I SPE I, LLC


Dated: July \_\_, 2024

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By: \_\_\_\_\_  
Jacqueline L. James , attorneys for HARVEST  
SMALL BUSINESS FINANCE, LLC

Dated: July 22, 2024

**ALDRIDGE PITE, LLP**

By:  \_\_\_\_\_  
Todd S. Garan, attorneys for WELLS FARGO  
BANK NATIONAL WEST

**PROOF OF SERVICE OF DOCUMENT**

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding.  
My business address is:

Saul Ewing LLP, 1888 Century Park East, Suite 1500, Los Angeles, CA 90067

A true and correct copy of the document entitled: **STIPULATION TO CONTINUE HEARING ON MOTION TO AUTHORIZE USE OF CASH COLLATERAL PURSUANT TO 11 U.S.C. § 363(C)(2)** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **July 22, 2024**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

**SEE ATTACHED.**

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (date), I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **July 22, 2024**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

**BY PERSONAL DELIVERY:**

Hon. vincent P. Zurzolo  
U.S. Bankruptcy Court  
Roybal Federal Building  
255 E. Temple Street, (BIN OUTSIDE SUITE 1360)  
Los Angeles, CA 90012

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 22, 2024  
Date

Easter A. Santa Maria  
Printed Name

  
Signature



**SERVICE BY NEF:**

Tanya Behnam on behalf of Creditor Korth Direct Mortgage Inc.  
tbehnam@polsinelli.com,  
tanyabehnam@gmail.com;ccripe@polsinelli.com;ladocting@polsinelli.com

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Jacqueline L James on behalf of Creditor Harvest Small Business Finance, LLC  
jjames@hrhlaw.com

Jacqueline L James on behalf of Interested Party Harvest Small Business Finance, LLC  
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Kelly L Morrison on behalf of U.S. Trustee United States Trustee (LA)

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Zev Shechtman on behalf of Debtor Susan Halevy  
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